

# NRC INSPECTION MANUAL

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## PART 9900: TECHNICAL GUIDANCE

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### STANDARD TECHNICAL SPECIFICATIONS LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS SECTION 3.0 AND 4.0

#### A. PURPOSE

To provide guidance on Standard Technical Specifications (STS) Sections 3.0 and 4.0 as they relate to limiting conditions for operation and surveillance requirements.

#### B. BACKGROUND

In a July 15, 1985 memorandum to NRR, Region I requested a clarification on when the time limitation for a technical specification action statement started. A response was provided to Region I by NRR in an August 9, 1985 memorandum. In that response, NRR stated that the time limitation is applicable from the time it is recognized that the limiting condition for operation is not met. However, in determining the safety significance of an enforcement action, the actual total time that the condition existed should be used, rather than when it was first identified to be in a limiting action statement. NRR also indicated in its response that the Technical Specification Review Group was preparing additional guidance on the application of Sections 3.0 and 4.0 of the STS that would further clarify time limitations related to limiting conditions for operation and surveillance requirements.

#### C. DISCUSSION

NRR provided the above interim guidance on STS Sections 3.0 and 4.0 on May 4, 1987 in Generic Letter 87-09 which was sent to all light water reactor licensees and applicants. The generic letter addresses three problems: (1) unnecessary restrictions on mode changes existing in STS 3.0.4, (2) unnecessary shutdowns caused by STS 4.0.3, and (3) conflicts that exist between STS 4.0.3 and 4.0.4. The additional guidance provided by Generic Letter 87-09 is referenced below.

#### D. REFERENCES

Memorandum from R. Starostecki, Director, Division of Reactor Projects, Region I, for H. Thompson, Director, Division of Licensing, NRR, dated July 15, 1985, Subject: Request for Technical Interpretation. (Document Control System 68026/256).

Memorandum from Hugh L. Thompson, Jr., Director, Division of Licensing, NRR, for Richard W. Starostecki, Director, Division of Reactor Projects, Region I, dated August 9, 1985, Subject: Technical Specification Interpretation (Document Control System 68026/252).

Generic Letter 87-09, dated June 4, 1987, Subject: Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements (Generic Letter 87-09) (Document Control System 41348/323).

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